

REMARKS

Claims 11-19 are pending in this application. By this Amendment, claims 1-10 are canceled without prejudice to, or disclaimer of, the subject matter recited in those claims. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested

The Office Action, in paragraph 3, rejects claims 1-3, 5-7, 9 and 10 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,259,405 to Stewart et al. (hereinafter "Stewart") in view of U.S. Patent No. 5,802,314 to Tullis. The Office Action, in paragraph 7, refers Applicants to the previous Office Action where claims 4 and 8 were rejected under 35 U.S.C. §103(a) over Stewart as applied to claim 1, and further in view of Official Notice. The cancellation of claims 1-10 renders these rejections moot.

The Office Action, in paragraph 8, rejects claims 11, 15, 18 and 19 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,295,551 to Roberts et al. (hereinafter "Roberts") in view of U.S. Patent No. 6,832,355 to Duperrouzel et al. (hereinafter "Duperrouzel"). The Office Action, in paragraph 10, rejects claims 13, 14, 16 and 17 under 35 U.S.C. §103(a) as being unpatentable over Roberts in view of Duperrouzel as applied to claim 11 above, and further in view of U.S. Patent Application Publication No. US 2003/0123079 A1 to Yamaguchi et al. (hereinafter "Yamaguchi"). The Office Action, in paragraph 12, rejects claim 12 under 35 U.S.C. §103(a) as being unpatentable over Roberts in view of Duperrouzel as applied to claim 11 above, and further in view of Stewart. These rejections are respectfully traversed.

Roberts teaches a call center system allowing a representative and a user to jointly browse World Wide Web content while simultaneously conducting a voice conversation over either a circuit switched or packet switched network (Abstract). In Roberts, the representative, as one of two users jointly browsing the content, may alter the representation

of the user view by selecting, at the representative's work station, a hyperlink or entering information into an HTML form, thereby updating the user's view (Abstract). The Office Action admits that Roberts does not explicitly teach a feature of the data symbols on the screen included in the web page used for the first device are drag-and-dropped in a predetermined area of the web page used for the second device. Rather, the Office Action relies on Duperrouzel as allegedly disclosing such a feature.

Duperrouzel teaches a display system that displays web pages from websites located on data communications networks in a plurality of non-overlapping display areas (Abstract). Duperrouzel at col. 2, lines 30-35 and col. 11, lines 25-37, discloses drag-and-dropping any URL that is displayed in one display pane into another display pane to display a web page that has the particular URL in another display pane displayed on the same device. In other words, Duperrouzel teaches, for example, a user selecting a URL directly from a favorites menu in one display pane by positioning a display cursor over the desired URL title and clicking the mouse button on the desired URL title, and then, with another click of a mouse button in another display pane, the user downloads a desired web page associated with the desired URL and subsequently displays the desired web page in another display pane on the same device. Duperrouzel, however, provides no teaching or suggestion of the web page including data symbols for displaying the specific data on a screen wherein the data symbols on the screen included in the web page used for the first device are dragged-and-dropped in a predetermined area of the web page used for the second device, as variously recited in independent claims 11, 15, 18 and 19. In fact, Duperrouzel does not suggest the manipulation of multiple devices at all.

The data symbols of the pending claims represent an image corresponding to the image data read by, for example, a scanner and held by a device service unit to be displayed in the web page of the first device. The image may be displayed unaltered, as per the image

data, or be displayed as a so-called thumbnail image, or another icon or figure, corresponding to the image data may be displayed (see Applicants' disclosure at paragraph [0062]).

Duperrouzel suggests no feature that reasonably corresponds to the recited data symbols.

Claim 11 recites, and in like matter claims 15, 18 and 19 recite, the data symbols on the screen included in the web page used for the first device are dragged-and-dropped in a predetermined area of the web page used for the second device. Duperrouzel cannot reasonably be considered to suggest such a feature for at least the reasons indicated above.

Further, Roberts and Duperrouzel are not combinable in the manner suggested by the Office Action and the assertion that simply because Roberts and Duperrouzel are alleged to be in analogous art, globally "facilitating communication using the Internet," not only misconstrues the standard for a showing that two references are analogous art, but also fails to meet the standard for providing objective evidence of a motivation, suggestion or teaching in the prior art to make the alleged combination. MPEP §2143.01 instructs that "[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination."

MPEP §2143.01 further instructs that "[a]lthough a prior art device 'may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so.'" *See also In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir.

1990). Applicant respectfully submits that the rejection of at least independent claims 11, 15, 18 and 19 is improper in view of at least MPEP §2143.01 because the Office Action fails to set forth the required specific evidence of a teaching, suggestion or motivation in the prior art for one of ordinary skill to combine the references.

The conclusory statement in the Office Action that one of ordinary skill in the art would have been motivated to make the combination "for the reasons discussed in Duperrouzel (col. 1, lines 45-67)" is not sufficient to overcome the above failure.

Specifically, it is not reasonable to conclude that when confronted with an objective of providing a data transmission system for commanding data transmissions by means of a simple operation without running different application programs for each connected device in a web based coordinating system, that one of ordinary skill in the art would have been directed to Duperrouzel. The disclosure in Duperrouzel regarding dragging and dropping URLs indicates that each web page may contain numerous hypertext links which link one web page to many other web pages of related information. Duperrouzel teaches that there is a need for a method that would enhance web browser capability and reduce the amount of time that a web page user requires to manage a web page browser. There is nothing in Duperrouzel, nor in the language above as cited by the Office Action, that suggests streamlining the coordination of multiple connected image forming devices with a single unit. Nor when, provided with the teachings of Roberts to a call center system, would one of ordinary skill in the art have recognized any combination of features that would streamline the function of coordinating differing applications in image forming devices such as those to which the subject matter of the pending claims is directed.

The Office Action, in paragraphs 11 and 13, in attempting to make the rejections of claims 12-14, 16 and 17 over Roberts and Duperrouzel in combination with one of Yamaguchi or Stewart, asserts that in regard to these claims, the rejections were set forth in the previous Office Action. Because Roberts was not mentioned at all in the previous Office Action, it is not strictly correct that the rejections were set forth in the previous Office Action. Applicants' interpret this language to indicate that the application of Yamaguchi and/or Stewart in further rejection of the pending claims regard only the additional features recited in the dependent claims to which the additional references may be directed. For at least the reasons indicated below, these rejections also fail.

Yamaguchi teaches a web based image forming apparatus (Abstract).

Stewart teaches a geographic-based communications service system that includes a network and a plurality of access points connected to the network and arranged at known locations in a geographic region so that a mobile user may use a portable computing device to connect to the network and access information or services from the network (Abstract).

Assuming that these references are, in fact, combinable with any permissible combination of Roberts and Duperrouzel, a conclusion that Applicants do not concede, there is nothing in either Yamaguchi or Stewart that overcomes the above-identified shortfalls in the application of the combination of Roberts and Duperrouzel to the subject matter recited in independent claims 11, 15, 18 and 19.

Applicants' respectfully submit therefore, that: (1) Duperrouzel does not teach all of the features that the Office Action alleges; (2) the references are not combinable in the manner indicated in the Office Action; (3) the motivation for one of ordinary skill in the art to combine the references in the manner indicated in the Office Action, as allegedly provided in Duperrouzel, is insufficient; and (4) none of the additionally applied references to Yamaguchi or Stewart overcome the shortfalls in the application of Roberts and Duperrouzel to the subject matter of the independent claims. As such, the references are not combinable in the manner suggested and to any extent that the references may be combinable, any such combination does not suggest the specific combinations of features recited in the pending claims.

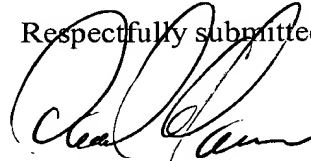
For at least these reasons, the combinations of Roberts and Duperrouzel, alone or with the other applied references, cannot reasonably be considered to have suggested all of the features recited in at least independent claims 11, 15, 18 and 19. Further, claims 12-14, 16 and 17 are also not suggested by any permissible combination of the applied references at least in view of their dependence on independent claims 11 and 15, as well as for the separately patentable subject matter which each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejections of claims 11-19 under 35 U.S.C. §103(a) over the combinations of the applied references are respectfully requested.

In view of the foregoing, Applicants respectfully submit that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 11-19 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact Applicants' undersigned at the telephone number set forth below.

Respectfully submitted,



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